

IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE WESTERN DISTRICT OF PENNSYLVANIA

IN RE:

Jessica M. Yon Debtor  
JPMorgan Chase Bank, N.A. Movant  
v.  
Jessica M. Yon and  
Ronda J. Winnecour, Trustee Respondents

NO. 16-70301-JAD

CHAPTER 13

Related to Doc. 58, 64 and 71

**STIPULATION AND ORDER**

AND NOW, come the undersigned parties, by and through their respective counsel, and enter into the following Stipulation:

WHEREAS, Movant maintains a claim secured by Debtor's 2015 Jeep Cherokee 2, VIN 1C4PJLCSXFW532677;

WHEREAS, Debtors' Chapter 13 Plan dated May 19, 2017 proposes to pay Movant's secured claim in full;

WHEREAS, Debtor's payments to Movant are delinquent;

WHEREAS, Movant has filed a motion for relief from the automatic stay seeking to recover possession of its collateral;

WHEREAS, Debtor has filed a response objecting to the motion for relief from stay.

It is therefore Stipulated and agreed as follows:

1. The automatic stay is terminated as it affects the interests of the Movant with respect to the 2015 Jeep Cherokee 2, VIN 1C4PJLCSXFW532677; provided however, that relief from stay is stayed in accordance with the conditions set forth in Paragraphs 2-5, below.

2. On a go-forward basis from and after the date of the Order approving this Stipulation, the Debtor shall timely make full plan payments to the Chapter 13 Trustee, on or before the date upon which the respective plan payment is due.
3. Time is of the essence as to all plan payments going forward.
4. For the duration of this bankruptcy case, in the event that the Debtor fails to make any subsequent plan payments to the Chapter 13 Trustee, then the stay provided in Paragraph 1, above, shall be vacated and the automatic stay unconditionally lifted as it affects the interests of the Movant with respect to the 2015 Jeep Cherokee 2, VIN 1C4PJLCSXFW532677, upon the filing of an Affidavit of Default by Movant without further hearing or without entry of an additional order, unless Movant has received payment of the full amount of the delinquent payment(s) within twelve (12) days from the date the Affidavit of Default is filed. Such Affidavit of Default shall contain a statement of default as supported by the Movant's own records as well as the records of the Chapter 13 Trustee.
5. In the event that the automatic stay is terminated as provided by this Order, then the Trustee shall make no further disbursements to any creditor on account of any secured claim that is secured by the subject collateral, unless directed otherwise by further Order of Court.
6. The hearing in this matter scheduled for October 20, 2017 at 1:30 PM is cancelled.

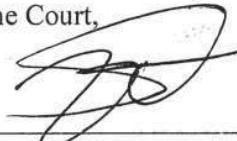
Consented to by:

/s/ Kenneth P. Seitz, Esquire  
Kenneth P. Seitz, Esquire  
Law Offices of Kenneth P. Seitz  
Attorney for Debtor  
P.O Box 211  
Ligonier, PA 15658  
Phone: 814-536-7470  
TheDebtErasers@aol.com

/s/ James C. Warmbrodt, Esquire  
James C. Warmbrodt, Esquire  
KML Law Group, P.C.  
Attorney for Movant  
701 Market Street, Suite 5000  
Philadelphia, PA 19106  
Phone: 215-627-1322  
jwarmingbrodt@kmllawgroup.com

It is hereby ORDERED that the parties' Stipulation be and hereby is APPROVED.

By the Court,



10-19-2017

Jeffery A. Deller  
Chief U.S. Bankruptcy Judge

FILED  
10/19/17 10:32 am  
CLERK  
U.S. BANKRUPTCY  
COURT - WDPA

**Certificate of Notice Page 4 of 4**  
**United States Bankruptcy Court**  
**Western District of Pennsylvania**

In re:  
 Jessica M Yon  
 Debtor

Case No. 16-70301-JAD  
 Chapter 13

**CERTIFICATE OF NOTICE**

District/off: 0315-7

User: bsil  
 Form ID: pdf900

Page 1 of 1  
 Total Noticed: 1

Date Rcvd: Oct 19, 2017

Notice by first class mail was sent to the following persons/entities by the Bankruptcy Noticing Center on Oct 21, 2017.

db +Jessica M Yon, 132 Mountain Ave., Hollidaysburg, PA 16648-3001

Notice by electronic transmission was sent to the following persons/entities by the Bankruptcy Noticing Center.  
 NONE.

TOTAL: 0

\*\*\*\*\* BYPASSED RECIPIENTS \*\*\*\*\*

NONE.

TOTAL: 0

Addresses marked '+' were corrected by inserting the ZIP or replacing an incorrect ZIP.  
 USPS regulations require that automation-compatible mail display the correct ZIP.

Transmission times for electronic delivery are Eastern Time zone.

I, Joseph Speetjens, declare under the penalty of perjury that I have sent the attached document to the above listed entities in the manner shown, and prepared the Certificate of Notice and that it is true and correct to the best of my information and belief.

**Meeting of Creditor Notices only (Official Form 309): Pursuant to Fed. R. Bank. P. 2002(a)(1), a notice containing the complete Social Security Number (SSN) of the debtor(s) was furnished to all parties listed. This official court copy contains the redacted SSN as required by the bankruptcy rules and the Judiciary's privacy policies.**

Date: Oct 21, 2017

Signature: /s/Joseph Speetjens

**CM/ECF NOTICE OF ELECTRONIC FILING**

The following persons/entities were sent notice through the court's CM/ECF electronic mail (Email) system on October 19, 2017 at the address(es) listed below:

James Warmbrodt on behalf of Creditor JPMORGAN CHASE BANK, N.A. bkgroup@kmllawgroup.com  
 Kenneth P. Seitz on behalf of Debtor Jessica M Yon thedebterasers@aol.com  
 Office of the United States Trustee ustpregion03.pi.ecf@usdoj.gov  
 Ronda J. Winneccour cmeccf@chapter13trusteeewdpa.com

TOTAL: 4